

16081583

Date: June 03, 2008

**510(k) Summary****JUL 28 2008****3-1. 510(k) owner (submitter)**

- |                           |   |
|---------------------------|---|
| 1) Name                   | KURARAY MEDICAL INC.  |
| 2) Address                | 1621 Sakazu, Kurashiki, Okayama 710-0801, Japan   |
| 3) Contact person         | Michio Takigawa<br>Quality Assurance Department   |
| 4) Contact person in U.S. | Koji Nishida<br>KURARAY AMERICA INC.<br>600 Lexington Avenue, 26th Floor<br>New York, NY 10022<br>Tel: (212)-986-2230 (Ext. 115) or (800)-879-1676<br>Fax: (212)-867-3543 |

**3-2. Name of Device**

- |                             |   |
|-----------------------------|---|
| 1) Trade / Proprietary name | CLEARFIL SA CEMENT  |
| 2) Classification name      | Dental cement<br>(21 CFR section 872.3275. Product code: EMA) |
| 3) Common name              | Dental adhesive resin cement                                  |

**3-3. Predicate device**

- |  |  |
|--|--|
| 1) PANA VIA F 2.0                        | 510(k) Number: K032455<br>Product Code: EMA<br>21 CFR Section: 872.3275<br>Applicant: KURARAY MEDICAL INC.               |
| 2) CLEARFIL ESTHETIC CEMENT &<br>DC BOND | 510(k) Number: K062410<br>Product Code: EMA<br>21 CFR Section: 872. 3275<br>Applicant: KURARAY MEDICAL INC.              |
| 3) MAXCEM                                | 510(k) Number: K041474<br>Product Code: EMA<br>21 CFR Section: 872. 3275<br>Applicant: SYBRON DENTAL<br>SPECIALTIES INC. |

### **3-4. Device Description**

- 1) CLEARFIL SA CEMENT is a dual-cure (light-and/or self-cure), self-adhesive resin cement for conventional porcelain, ceramic, hybrid ceramics (e.g. ESTENIA C&B), composite resin and metal restorations.
- 2) It is classified into dental cement (21 CFR section 872.3275, Product code: EMA ) according to 21 CFR § 872 since it is composed of various materials other than zinc oxide-eugenol.
- 3) According to the applicable FDA recognized consensus standard, ISO 4049: 2000 "Dentistry - Polymer-based filling, restorative and luting materials", this device is classified into the following:
  - Class 3: materials that are cured by the application of external energy and also have a self-curing mechanism present

### **3-5. Substantial Equivalence Discussion**

#### **1) Intended uses**

It is intended to be used for the indications listed in the left hand column of the table of "Section 5: Executive Summary, Table 5" that are equivalent to the predicate devices, PANA VIA F2.0 and CLEARFIL ESTHETIC CEMENT & DC BOND.

#### **2) Chemical ingredients / Safety**

All the chemical ingredients of CLEARFIL SA CEMENT, the subject device, have been used in the predicate devices, PANA VIA F2.0 and CLEARFIL ESTHETIC CEMENT & DC BOND. It indicates that the safety of the applicant device is substantially equivalent to that of the predicate devices.

#### **3) Effectiveness / Performance**

CLEARFIL SA CEMENT, the subject device, has been verified to comply with the requirements of the applicable FDA recognized consensus standard, ISO 4049: 2000 "Dentistry - Polymer-based filling, restorative and luting materials". As to comparison with the predicate device, MAXCEM, according to ISO 4049: 2000, it was proved that both the subject one and the predicate one complied with ISO 4049: 2000 and the subject one should be effective as well as the predicate one.

### **3-6. Biocompatibility**

All the chemical ingredients of CLEARFIL SA CEMENT, the subject device, have been used in the predicate devices as shown on the tables of "Section 7: Substantial Equivalence Discussion, Table: 7-2, 7-3, 7-4" where all the chemical ingredients of the subject device are listed in the left hand column and the abbreviated names of the predicate devices which contain the chemical component are listed in the right hand. From those tables, it can be said that the safety of the subject device is substantially equivalent to the predicate devices.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

JUL 28 2008

Kuraray Medical, Incorporated  
C/O Mr. Koji Nishida  
General Manager  
Kuraray America, Incorporated  
600 Lexington Avenue, 26<sup>th</sup> Floor  
New York, New York 10022

Re: K081583

Trade/Device Name: CLEARFIL™ SA CEMENT

Regulation Number: 872.3275

Regulation Name: Dental Cement

Regulatory Class: II

Product Code: EMA, KLE

Dated: June 3, 2008

Received: June 12, 2008

Dear Mr. Nishida:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Center for Devices and Radiological Health's (CDRH's) Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at 240-276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at 240-276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Chiu Lin", with a stylized flourish at the end.

Chiu Lin, Ph.D.

Director

Division of Anesthesiology, General Hospital,

Infection Control and Dental Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known): K081583

Device Name: CLEARFIL SA CEMENT

Indications for Use:

- 1) Cementation of crowns, bridges, inlays and onlays made of conventional porcelain, ceramic, hybrid ceramics, composite resin or metal
- 2) Cementation of metal cores, resin cores, metal posts or glass-fiber posts

Prescription Use ✓  
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use N/A  
(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER  
PAGE IF NEEDED)

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Concurrence of CDRH, Office of Device Evaluation (ODE)

Susan Reaver

Division Sign-Off)

Division of Anesthesiology, General Hospital  
Infection Control, Dental Devices

10(k) Number: K081583